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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA**

In re:  
Christopher Press  
Tracey Press

Debtors.

Case No. 20-10858-B-13F  
DCN: TCS-1  
CHAPTER 13

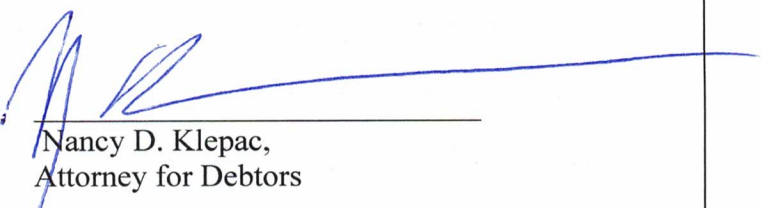
Hearing date and Time:  
Date: June 10, 2020  
Time: 9:30 A.M.  
Dept: B  
Ctmm: 13(5th Floor)  
United States Bankruptcy Court  
2500 Tulare Street  
Fresno, California 93721-1318

**MOTION FOR CONFIRMATION OF FIRST MODIFIED CHAPTER 13 PLAN  
PURSUANT TO 11 USC § 1329**

- 1) The Debtors, Christopher and Tracey Press, (hereinafter referred to as "Debtors"), hereby moves this Court for an Order confirming their First Modified Plan. In support of this motion, the Debtors state the following:
- 2) The Debtors commenced this case on documents on March 5, 2020 and their Chapter 13 Plan has not been confirmed.
- 3) The First Modified Plan rectifies the issues brought to the Debtors attention by the Chapter 13 Trustee at the 341 meeting of creditors.
- 4) The Debtors are concurrently filing amended Schedules I and J reflecting their current income and expenses.
- 5) This Modified Plan complies with applicable law.

- 1 6) Any fees or charges required by Chapter 123 of Title 28 of the U.S. Code have been paid.
- 2 7) The Plan is proposed in good faith and is not by any means forbidden by law.
- 3 8) This petition was filed in good faith. The Debtors intend to complete this Plan.
- 4 9) The distribution to the general unsecured creditors will be reduced to 16%, which is more
- 5 than would receive in the event of a Chapter 7 liquidation. The general unsecured creditors
- 6 would receive \$2,432.25 under the Chapter 7 liquidation analysis.
- 7 10) Although the Debtors are above the state median income they do not have any disposable
- 8 income available to their unsecured creditors.
- 9 11) Debtors have listed all of their assets in Schedule A and B and believe the values remain
- 10 the same, if not less.
- 11 12) As required by section 1325(a)(5)(B), the plan provides that all secured creditors retain
- 12 their lien on their collateral until the secured claim is paid or until the creditors accepts
- 13 surrender of their collateral. All secured creditors have either accepted the Plan, will be
- 14 allowed to collect and dispose of the collateral via surrender thereof, or will be paid the value
- 15 of their collateral pursuant to terms of the Plan. Either there are no motions to value or they
- 16 have been granted.
- 17 13) The Debtors have no domestic support obligation.
- 18 14) The Debtors have filed all applicable tax returns which have become due for the last four
- 19 years.
- 20 15) Based on the foregoing, the Debtors respectfully request that the Court confirm the First
- 21 Modified Chapter 13 Plan.

22 Dated: April 24, 2020

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25 Nancy D. Klepac,  
26 Attorney for Debtors  
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